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October 16, 2015

VIA ECF

Hon. Dora L. Irizarry
United States District Judge
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Weiss, et al. v. National Westminster Bank, Plc, 05-cv-4622 (DLI)(MDG)*
Applebaum, et al. v. National Westminster Bank, Plc, 07-cv-916 (DLI)(MDG)

Dear Judge Irizarry:

We write on all Plaintiffs' behalf in compliance with Your Honor's October 8, 2015 Order requesting "additional information concerning transfers of money" and Your Honor's request during the October 8 hearing to provide the Court with a list of additional relevant cases discussed during oral argument.

With respect to the number of transfers, we have conferred with defense counsel and have agreed to the following:

1. The parties agree that the available records indicate that there were 196¹ U.S. Dollar transfers by NatWest at the request of Interpal that cleared through the United States between 1996 and 2004 with a total amount of \$4,345,342.35.
2. The parties agree that there were a total of 496 transfers by NatWest at the request of Interpal that Plaintiffs allege NatWest transferred to Hamas-controlled entities or persons between 1996 and January 29, 2004 with a total amount of \$13,542,535.59.

¹ Defendant's Motion to Dismiss stated that there were 185 transfers cleared through the United States, and Plaintiffs' Opposition to Defendant's Motion to Dismiss stated that there were 233 transfers cleared through the United States. Upon reexamination solely of the records provided by Defendant, the parties were able to confirm that 196 of these transfers went through the United States.

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Regarding Your Honor's request for additional case law, Plaintiffs draw Your Honor's attention to the following:

1. *Orteck Int'l Inc. v. TransPacific Tire & Wheel, Inc.*, No. CIVA DKC 2005-2882, 2006 WL 2572474 (D. Md. Sept. 5, 2006), applying *ESAB Group, Inc. v. Centricut, Inc.*, 126 F.3d 617, 628–29 (4th Cir. 1997).

We are also providing with this letter the three corresponding slides to those used in the argument regarding *Crédit Lyonnais*. We thank the Court for its consideration.

Respectfully submitted,

/s/ Gary M. Osen

Enclosure

cc: All Counsel